

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicants:	Yu Deng	§	Art Unit:	2169
		§		
Serial No.:	10/797,266	§	Confirmation No.:	5355
		§		
Filed:	03/10/2004	§	Examiner:	Marc S. Somers
		§		
For:	Metadata-related Mappings	§	Atty. Dkt. No.:	200314604-1
	in a System	§		(HPC.0833US)
		§		
		§		

Mail Stop Appeal Brief-Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY BRIEF

Sir:

The following sets forth Appellant's Reply to the Examiner's Answer dated October 29, 2009.

A. REPLY TO EXAMINER'S ANSWER REGARDING CLAIMS 11, 12, 18, 19

The Examiner conceded that Cui fails to disclose the following elements of claim 11:

generating a node to represent a functional relationship between one or more objects of distinct ontologies in a metadata system;

associating a metadata expression of the functional relationship to the node; and

associating one or more parameters of the functional relationship to the node.

3/4/2009 Office Action at 3. Instead, the Examiner relied upon Ardoin and Bonatti as purportedly disclosing the claimed features missing from Cui.

As pointed out in the Appeal Brief, Ardoin and Bonatti clearly fail to disclose or hint at the following claimed subject matter: associating a metadata expression of the functional relationship (between one or more objects of distinct ontologies in a metadata system) to a node that represents the functional relationship.

The Response to Arguments section of the Examiner's Answer stated that "Ardoin is not the primary reference," and that Cui was relied upon as disclosing "distinct ontologies." Examiner's Answer at 9-10. However, although Cui discloses a mapping server that stores mappings between different ontologies, there is absolutely no hint in Cui of functional relationships between or among objects of distinct ontologies. On the other hand, Ardoin relates to defining relationships between nodes within just a single ontology. Moreover, note that the third reference, Bonatti, cited by the Examiner discloses that distinct ontologies are to be **integrated**. Integrating distinct ontologies, as taught by Bonatti, would render the teaching on Cui that mappings are provided between different ontologies irrelevant.

It is clear that modifying Cui with the teachings of Ardoin and Bonatti would have resulted in a significant change in the principle of operation of the Cui system. Therefore, this would clearly indicate that a person of ordinary skill in the art would not have been prompted to make a combination of Cui, Ardoin, and Bonatti to achieve the claimed subject matter.

In view of the foregoing, it is clear that the obviousness rejection of the foregoing claims is erroneous.

Therefore, reversal of the final rejection of the claims is respectfully requested.

Respectfully submitted,

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